

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

<b>North American Electric Reliability Corporation</b>	)	<b>Docket No.</b>	<b>RD10-14-000</b>
	)		
	)		
	)		

**MOTION TO INTERVENE AND COMMENTS IN SUPPORT OF THE ISO/RTO  
COUNSEL**

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission, the ISO/RTO Council (“IRC”)<sup>1</sup> respectfully submits the instant motion to intervene and comments in support of NERC’s June 21, 2010 compliance filing in the captioned proceeding.

**I. COMMUNICATIONS**

IRC respectfully requests that all pleadings, correspondence and other communications concerning this proceeding be directed to the following persons, and their names and addresses be placed on the official service list for Docket No. RD10-14-000.

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<sup>1</sup> The IRC is comprised of the Alberta Electric System Operator (“AESO”), the California Independent System Operator (“CAISO”), Electric Reliability Council of Texas (“ERCOT”), the Independent Electricity System Operator of Ontario, Inc., (“IESO”), ISO New England, Inc. (“ISONE”), Midwest Independent Transmission System Operator, Inc., (“Midwest ISO”), New York Independent System Operator, Inc. (“NYISO”), PJM Interconnection, L.L.C. (“PJM”), Southwest Power Pool, Inc. (“SPP”), and New Brunswick System Operator (“NBSO”). The IESO, AESO and NBSO are not subject to the Commission’s jurisdiction and these comments do not constitute agreement or acknowledgement that they can be subject to the Commission’s jurisdiction. The IRC’s mission is to work collaboratively to develop effective processes, tools and standard methods for improving the competitive electricity markets across North America. In fulfilling this mission, it is the IRC’s goal to provide a perspective that balances reliability standards with market practices so that each complements the other, thereby resulting in efficient, robust markets that provide competitive and reliable service to customers.

Craig Glazer  
Vice President - Federal Government Policy  
Rob Eckenrod  
Counsel  
**PJM Interconnection, LLC**  
1200 G Street, N.W. Suite 600  
Washington, D.C. 20005  
Tel: (202) 393-7756 -  
[glazec@pjm.com](mailto:glazec@pjm.com)  
[eckenr@pjm.com](mailto:eckenr@pjm.com)

Raymond W. Hepper  
Vice President & General Counsel  
Theodore Paradise  
Senior Regulatory Counsel  
**ISO New England, Inc.**  
One Sullivan Road  
Holyoke, Massachusetts 01040  
Tel: (413)540-4585  
[rhepper@iso-ne.com](mailto:rhepper@iso-ne.com)  
[tparadise@iso-ne.com](mailto:tparadise@iso-ne.com)

Stephen G. Kozey  
Vice President, General Counsel & Secretary  
**Midwest Independent Transmission  
System Operator, Inc.**  
P.O. Box 4202  
Carmel, Indiana 46082-4202  
Tel: (317)249-5400-  
[skozey@midwestiso.org](mailto:skozey@midwestiso.org)

Diana Pommen  
Director, Interjurisdictional Affairs  
**Alberta Electric System Operator**  
2500, 330 5th Ave. S.W.  
Calgary, Alberta  
T2P 0L4  
Tel: (403) 539-2510  
[diana.pommen@aeso.ca](mailto:diana.pommen@aeso.ca)

Anthony Ivancovich  
Assistant General Counsel - Regulatory  
**California Independent System  
Operator Corporation**  
151 Blue Ravine Road  
Folsom, California 95630  
T – 916-916-608-7135  
[aivancovich@caiso.com](mailto:aivancovich@caiso.com)

Robert E. Fernandez,  
General Counsel  
Elaine D. Robinson,  
Director Regulatory Affairs  
**New York Independent System Operator.**  
10 Krey Blvd  
Rensselaer, New York 12144  
Tel: (518) 356-6000  
[rfernandez@nyiso.com](mailto:rfernandez@nyiso.com)  
[erobinson@nyiso.com](mailto:erobinson@nyiso.com)

Brian Rivard  
Manager, Regulatory Affairs and Senior Policy Analysis  
**Ontario's Independent Electricity  
System Operator**  
655 Bay Street, Suite 410  
Toronto, Ontario  
M5G 2K4  
Tel: (905) 855-6100  
[brian.rivard@ieso.ca](mailto:brian.rivard@ieso.ca)

Matthew Morais  
Assistant General Counsel  
**Electric Reliability Council of Texas**  
7620 Metro Center Drive  
Austin, Texas 78744  
Tel: (512) 225-7177-  
[Mmorais@ercot.com](mailto:Mmorais@ercot.com)

Stacy Duckett  
General Counsel & Corporate Secretary  
**Southwest Power Pool**  
415 North McKinley  
#140 Plaza West  
Little Rock, Arkansas 72205  
Tel: (501) 614-3296  
[sduckett@spp.org](mailto:sduckett@spp.org)

## **II. MOTION TO INTERVENE**

The IRC is comprised of ten functioning Independent System Operators (“ISOs”) and Regional Transmission Organizations (“RTOs”) in North America. The IRC’s mission is to work collaboratively to develop effective processes, tools and standard methods for improving the competitive electricity markets across North America. In fulfilling this mission, it is the IRC’s goal to provide a perspective that balances reliability standards with market practices so that each complements the other, thereby resulting in efficient, robust markets that provide competitive and reliable service to customers.

The IRC members are subject to the mandatory Reliability Standards in their individual capacities and must comply with applicable data collection efforts such as the collection of data associated with nuclear restoration times. The IRC members therefore will be significantly impacted by any Commission’s determination in this docket. The IRC respectfully submits that the IRC’s intervention in this proceeding is in the public interest. IRC has a direct and vital interest in the matters addressed herein that cannot be adequately be represented by any other party.

### **III. COMMENTS IN SUPPORT**

In its filing, NERC seeks to discontinue quarterly data collection associated with nuclear restoration times, as required in Order No. 693. The IRC supports NERC's request that the Commission re-consider the value of continuing this data collection exercise. Recent adoption of Reliability Standard NUC-001-2 — Nuclear Plant Interface Coordination Reliability Standard, and modified Reliability Standard EOP-005-2 — System Restoration from Blackstart Resources Reliability Standard, have increased attention to the issues surrounding the nuclear plant interface with the transmission system, including restoration of nuclear power facilities, and has prescribed accountability for those issues. Compliance monitoring by registered entities and regional entities will more effectively take the place of the data collection effort as the means for addressing these issues. Finally, the IRC submits that the data submissions to-date support the conclusion that priority is being given to restoration of off-site power to nuclear stations. Under these circumstances, the continued need for the collection of data that is the subject of NERC's compliance filing is not apparent.

### **IV. CONCLUSION**

WHEREFORE, for the reasons stated above, the IRC requests that the Commission consider these comments and re-consider the value of continuing this data collection exercise.

Respectfully submitted,

/s/ Craig Glazer

Craig Glazer  
Vice President-Federal Government Policy  
Robert Eckenrod  
Counsel  
**PJM Interconnection, LLC**  
1200 G Street, N.W. Suite 600  
Washington, D.C. 20005

/s/ Stephen G. Kozey

Stephen G. Kozey  
Vice President, General Counsel,  
and Secretary  
**Midwest Independent Transmission  
System Operator, Inc.**  
P.O. Box 4202  
Carmel, Indiana 46082-4202

/s/ Anthony Ivancovich

Anthony Ivancovich  
Assistant General Counsel-Regulatory  
**California Independent System  
Operator Corporation**  
151 Blue Ravine Road  
Folsom, California 95630

/s/ Stacy Duckett

Stacy Duckett  
General Counsel & Corporate Secretary  
**Southwest Power Pool**  
415 North McKinley  
#140 Plaza West  
Little Rock, Arkansas 72205

/s/ Matthew Morais

Matthew Morais  
Assistant General Counsel  
**Electric Reliability Council of Texas**  
7620 Metro Center Drive  
Austin, Texas 78744

/s/ Raymond W. Hepper

Raymond W. Hepper  
Vice President, General Counsel, & Secretary  
Theodore J. Paradise  
Senior Regulatory Counsel  
**ISO New England, Inc.**  
One Sullivan Road  
Holyoke, Massachusetts 01040

/s/ Brian Rivard

Brian Rivard  
Manager, Regulatory Affairs  
and Senior Policy Analysis  
**Ontario's Independent Electricity  
System Operator**  
655 Bay Street, Suite 410  
Toronto, Ontario  
M5G 2K4

/s/ Robert E. Fernandez

Robert E. Fernandez  
General Counsel  
Elaine D. Robinson  
Director of Regulatory Affairs  
**New York Independent System Operator**  
10 Krey Blvd  
Rensselaer, New York 12144

/s/ Diana Pommen

Diana Pommen  
Director Interjurisdictional Affairs  
**Alberta Electric System Operator**  
2500, 330 5<sup>th</sup> Ave. S.W.  
Calgary, Alberta  
T2P 0L4

Date: August 20, 2010

## CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service list for the captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 20<sup>th</sup> day of August, 2010.

*Anna Pascuzzo*

Anna Pascuzzo